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**From:** Kovner, Karissa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CA322D5BBC4D4A2A96A957CA09378CA0-KKOVNER]  
**Sent:** 12/18/2020 12:43:02 PM  
**To:** Kei Woodall [kei.ohno-woodall@brsmeas.org]  
**CC:** Nazef, Laura [Nazef.Laura@epa.gov]; Perron, Monique [Perron.Monique@epa.gov]; Nichols, Elizabeth S [NicholsES@state.gov]  
**Subject:** Comments from the United States for POPRC-16 (due December 18, 2020)  
**Attachments:** image003.png; United States\_DP Risk Profile UNEP-POPS-POPRC.16-2.docx; United States\_PFOA List UNEP-POPS-POPRC.16-INF-12.docx; United States\_UV-328 Proposal UNEP-POPS-POPRC.16-4.docx

Dear Kei,

I hope you're doing well!

We appreciate the opportunity to provide comments in advance of the POPRC meeting in January. We hope that having participants begin to share comments now will help facilitate progress during the meeting!

Attached are some of our technical comments on the Dechlorane Plus draft risk profile, the proposal for UV-328, and the indicative list of PFOA, its salts and PFOA-related compounds. We look forward to sharing our further views at the meeting.

We also wanted to note that in Paragraph 142 of the Methoxychlor draft risk profile, there is a sentence that states "However, these values were based on an incomplete database, as several regulators (US EPA, 2004) noted that deficiencies in the available data precluded a comprehensive risk assessment." Several regulators implies there are others besides U.S. EPA. Citations for the other regulators should be added. Otherwise, the sentence needs to be edited to make it clear that it is only referring to the EPA Reregistration Eligibility Decision (RED) that is currently cited here.

In addition, we noticed an error in Appendix 1 of the Secretariat's report for the evaluation of BDEs, which includes the United States in the compilation of submissions by Parties. While we hope that will indeed be true someday, sadly this year it is not! ;)

We look forward to further discussions at the meeting.

Happy Holidays! And all my best to you and the team. I miss you guys!

Cheers,  
Karissa  
EPA mobile: (202)365-7838

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**From:** Kei Ohno Woodall <kei.ohno-woodall@brsmeas.org>  
**Sent:** Wednesday, December 09, 2020 4:46 PM  
**To:** poprc16 <poprc16@brsmeas.org>  
**Subject:** POPRC-16: Comments by 18 December 2020  
**Importance:** High

Dear POPRC-16 participants,

Many thanks for attending the pre-meetings held from 1 to 3 December 2020.

**As announced, please submit your comments by 18 December 2020.**

The documents for review and comments are attached to this email:

- Dechlorane Plus draft risk profile (UNEP/POPS/POPRC.16/2)
- Methoxychlor draft risk profile (Pre-meeting document 2/Rev.2)
- Report on the review of information related to specific exemptions for decaBDE (INF/7)
- Report on the review of information related to specific exemptions for SCCPs (INF/8)
- Secretariat's report for the evaluation of BDEs (INF/11)
- Indicative list of PFOA, its salts and PFOA-related compounds (INF/12)

In addition, views on the evaluation of the proposal for listing UV-328 against the screening criteria in Annex D are also welcome.

Please be reminded however that the proposal in document is not to be revised by the Committee.

Please also take the opportunity for the technical trial sessions available tomorrow and 7 Jan 2021 as follows:

- **Thursday, 10 December 2020:** 8–10 a.m., 2–4 p.m., 6–8 p.m. (UTC +1)
- **Thursday, 7 January 2021:** 8–10 a.m., 2–4 p.m., 6–8 p.m. (UTC +1)

To access all online sessions including technical trials, you need to activate your intranet account, following the instructions provided in the email "SC POPRC-16- INVITATION EMAIL to activate your user account" sent from "BRS Secretariat (No-Reply)". The intranet site is here:

<https://paperless.brsmeas.org/>

If you need any support in activating your intranet account, please let me know.

Kind regards,

Kei

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Kei Ohno Woodall

Secretariat of the Basel, Rotterdam and Stockholm Conventions

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